REMARKS

Applicants thank the Examiner for the detailed examination of this application. By this Reply, Applicants cancel claims 22 and 24 without prejudice or disclaimer, and add new claims 45-49. Claims 1-21, 23, and 25-49 are pending in the application. Full support for newly added claims 46-49 can be found in the specification, including at page 11, lines 7 to 18, for example. Full support for newly added claim 45 can be found in the specification, including at page 9, lines 3-9, for example. No new subject matter has been added. In view of the foregoing amendments and the remarks set forth below, Applicants respectfully request the prompt re-examination and allowance of this application.

Priority

In the Office Action, the Examiner noted that in order to claim the benefit under 35 U.S.C. § 119(e) or under 35 U.S.C. § 120, a specific reference to the prior-filed application must be included in the first sentence(s) of the specification following the title or in an application data sheet. Office Action at 2. In response, Applicants add a first paragraph to the specification claiming priority to Provisional Application No. 60/262,361 ('361 application), as well as prior Canadian Patent Application Nos. 2,339,063 ('063 application) and 2,349,227 ('227 application).

Accordingly, Applicants submit that the Examiner's concerns have been addressed and submits that the claims to priority to the '361 application, the '063 application, and the '227 application are in compliance with 37 C.F.R. § 1.78(a).

Rejection under 35 U.S.C. § 112

Claims 1-6 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for reciting the term "the multiple organizations". Office Action at 2. Specifically, the Examiner asserts that this term lacks antecedent basis. Office Action at 2. Applicants respectfully request reconsideration of this rejection.

Applicants note that the term "multiple organizations" is introduced in the fourth line of claim 1 as reproduced in the claim amendments section of this response. As such, Applicants respectfully submit that there is no antecedent issue with respect to this term in claims 1 to 6.

Further, the Examiner stated that that "[f]or the purposes of examination on the merits 'multiple organizations' will be taken to mean either of multiple organizations within a company, or multiple companies within an enterprise." Office Action at 3. Applicants note that the Examiner believes that organizations within the multiple organizations must somehow be related. Applicants respectfully submit that there is not intention on the part of the inventors that the organizations must be related.

The term "organization" is used in the specification to broadly denote commercial and non-commercial companies. See, for example, page 7, lines 20-21. The data warehouse described and claimed in the application is comprehensive and applicable to (and thus can be used by) many organizations (i.e., businesses, companies, corporations, non-profit companies, government, etc.) to create their data warehouse. The claimed data warehouse is configurable to a particular organization. That is, although the non-configured data warehouse can apply to many companies, the data

warehouse is configured to be used by one company. Multiple companies do not use the same configured data warehouses. Rather, the same non-configured data warehouse can be configured separately for each organization (business, company, etc.) into a separate and distinct data warehouse. For these reasons, Applicants respectfully request the withdrawal of the § 112 rejection of claims 1-6.

Rejection under 35 U.S.C. § 103

Claims 1-44[1] were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,212,524 to Weissman et al. and U.S. Patent No. 6,161,103 to Rauer et al. (collectively "Weissman") in view of WO 2000/042553 to Gardepe et al. (assigned to Harmony). Applicants respectfully traverse this rejection. A proper *prima facie* case of obviousness requires, among other things, that the cited prior art references when combined must teach or suggest each and every limitation recited in the claims. See MPEP § 2142. The § 103 rejection does not establish that Weissman in view of Harmony teaches or suggests all of the claim limitations.

Independent claim 1 recites "[a] data warehouse system for managing performance of organizations . . . comprising: a data model for storing data representing dimensions and measures applicable for multiple organizations, the data model having placeholders settable such that the data model represents a particular organization; and

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[1] At page 3, the Office Action states that only "Claims 1-6" are rejected under 35 U.S.C. § 103(a), but pages 7-10 list claims 7-44, so Applicants assume that the Examiner made a typographical error on page 3.

a configuration unit for setting the placeholders such that the data model represents the particular organization."

The Examiner admits that Weissman does not disclose a data module that is applicable for multiple organizations. Office Action at 4. Instead, Weismann discloses a data mart for use with a single enterprise. Weismann, cl. 35, l. 24 - cl. 8, ll. 43; Figs. 7-33. There is no teaching or suggestion that the data mart is applicable to multiple organizations and configurable to a particular organization.

The Examiner introduces Harmony to remedy the deficiencies of Weismann. Harmony, however, also fails to disclose these features. Instead, Harmony discloses the use of data marts for entities *within* an organization. For example, enterprises 102 and 104 are connected to local transaction systems 108-112 and 120-124, respectively. Harmony, p. 6, ll. 1-5. Each of local transaction systems 108-112 and 120-124 is configured to gather business information about an entity of enterprise 102 and 104, respectively, such as manufacturing and inventory. Harmony, p. 6, ll. 16-20. Metastorage server 114 and 126 solve the compatibilities between the local transaction systems, and the gathered information is used to generate databases, data warehouses, and data marts. Harmony, p. 7, ll. 4-13. However, Harmony does not disclose or suggest a data model that is applicable to multiple organizations, yet configurable to represent a particular organization, as required by claim 1. To the contrary, Harmony teaches that each enterprise must *adopt* a standard method of describing business information, rather than provide the business information as a data module that is applicable to multiple enterprises, while configurable for use with a single enterprise. Harmony, p. 11-12.

Further, Applicants note that the Examiner's statements on page 4 of the Office Action regarding the subject matter disclosed by Weissman and Harmony are not drawn to a data warehouse system that can used by many companies. Rather, these references refer to the use of data marts for entities within a single organization. As mentioned above, entities within an organization are not considered "organizations" in the present application. Rather, these entities (i.e., departments of a business, company, etc.) are considered as separate business activities or areas of analysis in the present application. Thus, a data mart for one of these business activities or areas of analysis is not comprehensive enough to be configured to analyze an entire organization, let alone multiple organizations. A plurality of data marts, at best, may be able to analyze a plurality of business activities or areas of analysis, however, there is no teaching in the cited references as to how to connect each data mart to serve an entire organization, nor how to make the plurality of data marts applicable to multiple organizations (businesses, companies, etc.) while configurable to represent a particular organization.

The conventional data warehouse and conventional data mart technologies, such as those discussed in the art cited by the Examiner, are neither configurable nor integrated. Rather, a specific company (in the case of data warehouse) or a specific department of a company (in the case of a data mart) is analyzed by a human professional to design the conventional data warehouse for that company or data mart for that department.

In contrast, the present invention discloses a data model that can be applied to multiple companies, but configurable to represent a particular company. The present

application is not merely a better data model design for a conventional data warehouse. The claimed data model is designed to store data representing dimensions and measures (currently implemented as dimensional tables and fact tables) applicable to a plurality of organizations. The claimed data model contains "placeholders" or parameters in its structure that allow for the data model to be configured to represent a particular organization. Data models for conventional data warehouses do not have these "placeholders". The configurable data warehouse system in the present application also includes a configuration unit that is used to configure the data model. In one embodiment, this configuration unit receives information and/or instructions regarding a particular organization, and configures the placeholders or parameters of the data model accordingly. None of the cited references, either alone or in combination, teach these features.

Configuring the data model having placeholders is not taught or suggested by modeling a company from scratch and then hard coding a conventional data warehouse. In the methodology for creating the data model and data warehouse system, taught in pages 38 to 48 of the specification, among other places, one can see that a person skilled in the art would never consider having such placeholders. Moreover, embodiments of the claimed data model are designed to represent organizations from both a breadth perspective of the entire organization and a depth perspective for a particular unit of the organization. Conventionally, only specific business questions for a breadth perspective of a company are asked to determine the data warehouse modeling needs for that particular company. A person skilled in the art would not ask business questions for other types of organizations, or even for a depth

perspective of a particular unit of an organization, when developing a conventional data warehouse model.

Another aspect to the configurability of at least one embodiment of the claimed data warehouse system is that it can be reconfigured after time. Thus, if an organization changes over time, the data warehouse system can be reconfigured. A conventional data warehouse cannot be reconfigured (neither can conventional data marts). Rather, another conventional data warehouse (or another conventional data mart) would have to be created from scratch; which is costly and time consuming. This "reconfigurability" aspect provided by the configuration unit and the placeholders further emphasizes the novelty of the configurable data warehouse system over a conventional data warehouse or plurality of conventional data marts as taught in the cited art.

Specific technical differences between a conventional data warehouse and the configurable and integrated data warehouse system are also taught in the specification. For example, Fig. 2 shows configurable aspects 125, 135, 145, of an embodiment of the configurable data warehouse system 100 that are not present in a conventional data warehouse. These configurable aspects 125, 135, 145, are further described in the disclosure at pages 9 to 11 with reference to Figures 2 to 4. Another example of a technical difference is found on pages 15 to 16 of the specification, where the application discusses an embodiment of the dimensional framework. In particular, page 16, lines 4 to 6 clearly provide that "in the configurable data warehouse system 100, the set of dimensions may be applicable to many different organizations; rather than custom-built for one particular organization." Other technical differences are presented throughout the specification.

The technical differences found in the configurable data warehouse system provide advantages that are both technical and economic in nature. For example, the configurable data warehouse system is applicable to many different organizations and may be configured to represent a particular organization. The action of configuring (or reconfiguring) the configurable data warehouse system is considerably faster than creating a conventional data warehouse from scratch. Thus, the time and money spent creating a data warehouse can be greatly reduced. This is a significant economic advantage for an organization that desires a data warehouse. Other advantages are discussed throughout the application.

For the foregoing reasons, Applicants respectfully request the withdrawal of the § 103 rejection and the timely allowance of claim 1. Because claims 2-17 depend directly or indirectly from claim 1, Applicants respectfully request the withdrawal of the § 103 rejection and the timely allowance of these claims as well. Further, because new claim 45 depends indirectly from claim 1, Applicants submit that this claim is also allowable over the cited references.

Independent claims 18, 19, 21, 23 and 38-43, although different in scope, recite limitations similar to those of independent claim 1. Therefore, Applicants respectfully request the withdrawal of the § 103 rejection and the timely allowance of these claims for at least the same reasons as those discussed above in connection with claim 1. Further, because claims 20, and 24-37 depend from claims 19 and 23, respectively, Applicants respectfully request the withdrawal § 103 rejection and the timely allowance of these claims as well.

Additionally, newly added independent claims 46, 48, and 49, although different in scope, also recite limitations similar to those of claim 1. Therefore, Applicants respectfully submit that these claims are allowable over the cited references for at least the reasons discussed above in connection with claim 1. Claim 47 depends from claim 46 and is likewise allowable over the cited references. Applicants request the timely allowance of claims 46-49.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based on the arguments presented in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The pending claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advance without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account 06-0916.

Respectfully submitted,

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Dated: June 22, 2007

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